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U.S. Department of Transportation Dockets
Attn - Docket No FAA-2002-12504
400 Seventh Street
SW Plaza Level
Room 401
Washington
DC 20590
U.S.A.

Subject - Docket No. FAA-2002-12504 Security Considerations for the Flight
Deck on Foreign Operated Transport Category Airplanes

Further to the Public Meeting regarding the Security Considerations for the Flight Deck on Foreign Operated Transport Category Airplanes which took place on Tuesday 30th. July 2002, please find below additional comments to the presentation made by Virgin Atlantic Airways during the Public meeting.

Introduction

Following the events of September 11th 2001, Virgin Atlantic placed purchase orders with Boeing and Airbus in April 2002 for Phase 2 doors for it's fleet of aircraft that complied with the requirements defined by the FAA, JAA, ICAO, CAA and the UK Department for Transport.

The Virgin Atlantic Fleet of aircraft consists of 10 - A340-300's, 12 - B747-400's and 10 - A340-600's.

At that time, Boeing were predicting kit deliveries in July 2002 and Airbus were predicting kit deliveries in August 2002 despite the fact that the design and certification activities were In complete.

Current Status

VAA were due to receive Boeing 747-400 door kits in July for installation in August and were asked to be the validation customer for type C doors for 5th. August, Boeing then slipped this date to 19th. August which VAA could not support. Boeing then advised of a further slippage on the 1st August and requested another validation customer for a September Install for which VAA proposed three dates for the three C checks. On the 8th. August Boeing then stated that they

would not be in a position for type C door validation until October. VAA do not have any C checks in October but supplied Boeing with two C check dates in November. After validation of a door type it will be about four weeks after that the Rev 0 of the SB and kits will be available, so this will put kit availability in November 2002.

The Airbus situation is very similar to Boeing's with sliding kit delivery dates. This has been compounded by a failure during decompression testing which has lead to further delays and increased costs to the airlines as Bulkhead modification kits are also required. Airbus will now be issuing two SB's one for the door and a second for the bulkhead. The Door SB was to be available in July, and VAA were to have the first kit in August for a September installation. Now both Airbus SB's will only be available in October with limited kit availability in November 2002.

Installation down time.

Boeing - Originally this was for a down time of 18 hours. Recent reports from Boeing now indicate that we are looking at a down time of 4 days for the door installation.

Airbus. This is currently quoted at 10 days for the door and bulkhead installation.

Both installations are so far unproven as far as man-hours and lapse time are concerned.

OEM kit availability.

With the delay in certification, this puts into question the ability of the OEM's to meet the global requirements for kit deliveries to meet the compliance date.

With the compressed time frame for incorporation of the compliant doors, the increase in installation time and availability of hangar facilities; there is a growing concern that airlines will not be able to meet the time scales set by the Authorities. VAA use third party maintenance organisations, so are reliant on them for hangar space and manpower for the installations. If special maintenance inputs are required it will be dependant on hangar space and manpower. With current C check times as 5 days, VAA would need to schedule additional down time (hangar availability permitting) on top of the standard C check for the door installation.

Conclusion

Whilst Virgin Atlantic fully support any measures taken to prevent further terrorist attacks, we feel that the compliance is not a realistic one due to late kit deliveries and extended downtimes.

The cost for kits alone range from \$38,400 for a Boeing B747-400 door to an estimated \$195,000 for a Boeing B747-200 Door and this excludes man-hour costs for their installation.

Furthermore, the majority of the VAA fleet provide daily services to both the East and West coast of the United States of America and if we are not allowed to operate in US airspace due to incomplete security modifications, we estimate that it will cost the Airline approximately \$140,000 per day to

ground each Aircraft in parking fee's and lost revenue which is particularly sensitive in the current financial climate.

Kind Regards,

Steve Normington
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